

EPA-4757

Wendy Blake/DC/USEPA/US

03/05/2012 01:02 PM

To Susan Stahle

cc

bcc

Subject Re: Revisions to Subpart W Preamble and Rule - PRA/ICR and cost impacts discussion issues

Sue - I think this is correct. I think they can simply update the ICR renewal to add the new requirement. Sheila may have encountered a similar situation with her 112(j) reg. revisions a few years ago. W

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Susan Stahle

[The ICR renewal would apply for the existing rep...](#)

03/05/2012 12:59:15 PM

From: Susan Stahle/DC/USEPA/US
To: Tom Peake/DC/USEPA/US@EPA
Cc: Reid Rosnick/DC/USEPA/US@EPA, Alan Perrin/DC/USEPA/US@EPA, Daniel Schultheisz/DC/USEPA/US@EPA, Wendy Blake/DC/USEPA/US@EPA, Philip Egidi/DC/USEPA/US@EPA
Date: 03/05/2012 12:59 PM
Subject: Re: Revisions to Subpart W Preamble and Rule - PRA/ICR and cost impacts discussion issues

The ICR renewal would apply for the existing reporting requirements in the rule. Subpart W does not currently contain recordkeeping requirements, so the ICR renewal would not address them.

I don't know whether the ICR renewal could be amended to include the recordkeeping requirement. If so, it seems the amendment should include a description of the new requirement and an estimate of the burden for the newly proposed recordkeeping requirement. You could check with Philip in OECA and/or we can check with Grant tomorrow.

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Tom Peake

[Sue and Reid, I appreciate your input on this effort.](#)

03/05/2012 12:33:23 PM

From: Tom Peake/DC/USEPA/US
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Cc: Reid Rosnick/DC/USEPA/US@EPA, Alan Perrin/DC/USEPA/US@EPA, Daniel Schultheisz/DC/USEPA/US@EPA, Wendy Blake/DC/USEPA/US@EPA, Philip Egidi/DC/USEPA/US@EPA

Date: 03/05/2012 12:33 PM
Subject: Re: Revisions to Subpart W Preamble and Rule - PRA/ICR and cost impacts discussion issues

Sue and Reid,
I appreciate your input on this effort.

We have an ICR for rad NESHAPs that is currently in the renewal phase. Wouldn't it apply? Could we make changes at this stage if need be?

This was in the FR on January 24.

<http://www.gpo.gov/fdsys/pkg/FR-2012-01-24/pdf/2012-1364.pdf>

60-day comment period now underway.

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Susan Stahle

Hi Reid - I've reviewed the changes you describe...

03/05/2012 11:52:04 AM

From: Susan Stahle/DC/USEPA/US
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Cc: Alan Perrin/DC/USEPA/US@EPA, Daniel Schultheisz/DC/USEPA/US@EPA, Tom Peake/DC/USEPA/US@EPA, Wendy Blake/DC/USEPA/US@EPA
Date: 03/05/2012 11:52 AM
Subject: Re: Revisions to Subpart W Preamble and Rule - PRA/ICR and cost impacts discussion issues

Hi Reid -

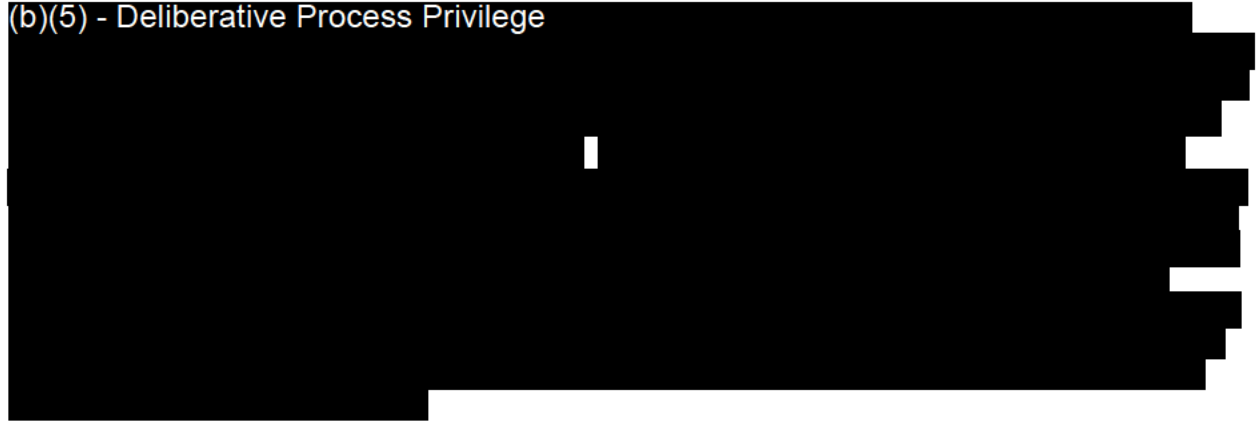
I've reviewed the changes you described below.

I've made edits in those sections that I hope you can see since it appears they show up in red. I highlighted in yellow some of my edits so you can see them but did not do that throughout the package.

It appears that the remaining issues with the package are as follows:

(b)(5) Process Privilege


(b)(5) - Deliberative Process Privilege



(b)(5) - Deliberative Process Privilege



(b)(5) - Deliberative Process Privilege



Please let me know if you have any questions.

[attachment "Draft Outline FR Proposal for Revision of Subpart W Rev10 (ss 030512).docx" deleted by Tom Peake/DC/USEPA/US]

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Reid Rosnick

From: Reid Rosnick/DC/USEPA/US To: Susan S...


03/01/2012 04:59:57 PM

From: Reid Rosnick/DC/USEPA/US
To: Susan Stahle/DC/USEPA/US@EPA
Cc: Alan Perrin/DC/USEPA/US@EPA, Tom Peake/DC/USEPA/US@EPA, Daniel Schultheisz/DC/USEPA/US@EPA
Date: 03/01/2012 04:59 PM
Subject: Revisions to Subpart W Preamble and Rule

Hi Sue,

Attached for your review are the revisions I made based on your comments from Monday. Any area where you made changes I accepted, so you won't see those passages in red. Where you made comments I have changed or added text. I left your comments on the side so you could see where the change are. For your convenience, the pages with changes are located at:

(b)(5) - Deliberative Process Privilege



Please let me know if you have any question. Thanks

Reid

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